

EX PARTE OR LATE FILED



Anthony M. Alessi
Director
Federal Relations

RECEIVED

June 28, 1999

JUN 28 1999

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Ms. Magalie Roman Salas
Secretary
Federal Communications Commission
The Portals
445 12th Street, SW
Washington, DC 20554

Re: **Ex Parte Presentation**
CC Docket No. 96-45 and CC Docket 96-262

Dear Ms. Salas:

On Friday, June 25, 1999, representatives of Ameritech (Ed Wynn, Kristen Schulman, Karl Wardin, Kathy Franco, Tom O'Brien, Harry Albright, Neil Briskman and Tony Alessi) met with Larry Strickling, Chief, Common Carrier Bureau and Bill Rogerson, Consultant to FCC, to discuss Ameritech's position on universal service and access reform as reflected in the record. In addition, the attached material was used during the discussion.

Sincerely,

A handwritten signature in cursive script that reads "Anthony M. Alessi".

Attachment

cc: L. Strickling
B. Rogerson

Universal Service & Access Reform
June 25, 1999



Comparison of Wholesale and Retail Rates

UNE Loop Rates for Ameritech

| <u>Area</u> | <u>Illinois</u> | <u>Indiana</u> | <u>Michigan</u> | <u>Ohio</u> | <u>Wisconsin</u> |
|-------------|-----------------|----------------|-----------------|-------------|------------------|
| A | \$2.59 | \$8.03 | \$9.43 | \$5.93 | \$10.90 |
| B | \$7.07 | \$8.15 | \$12.02 | \$7.97 | \$10.90 |
| C | \$11.40 | \$8.99 | \$14.86 | \$9.52 | \$10.90 |

Retail Residential Rates for Ameritech

| <u>Area</u> | <u>Illinois¹</u> | <u>Indiana²</u> | <u>Michigan³</u> | <u>Ohio¹</u> | <u>Wisconsin¹</u> |
|-------------|-----------------------------|----------------------------|-----------------------------|-------------------------|------------------------------|
| A | \$6.05 | \$16.67 | \$17.19 | \$10.20 | \$9.99 |
| B | \$9.03 | \$14.61 | \$16.95 | \$10.20 | \$9.99 |
| C | \$12.50 | \$13.35 | \$16.09 | \$10.20 | \$9.99 |

Difference: Retail Rates – UNE Rates

| <u>Area</u> | <u>Illinois</u> | <u>Indiana</u> | <u>Michigan</u> | <u>Ohio</u> | <u>Wisconsin</u> |
|-------------|-----------------|----------------|-----------------|-------------|------------------|
| A | \$3.46 | \$8.64 | \$7.76 | \$4.27 | \$(0.91) |
| B | \$1.96 | \$6.46 | \$4.93 | \$2.23 | \$(0.91) |
| C | \$1.10 | \$4.36 | \$1.23 | \$0.68 | \$(0.91) |

Residential Rates include \$3.50 for End User Common Line Charge (EUCL).

Access Area A = “Low Cost” Area

Access Area B = “Medium Cost” Area

Access Area C = “High Cost” Area

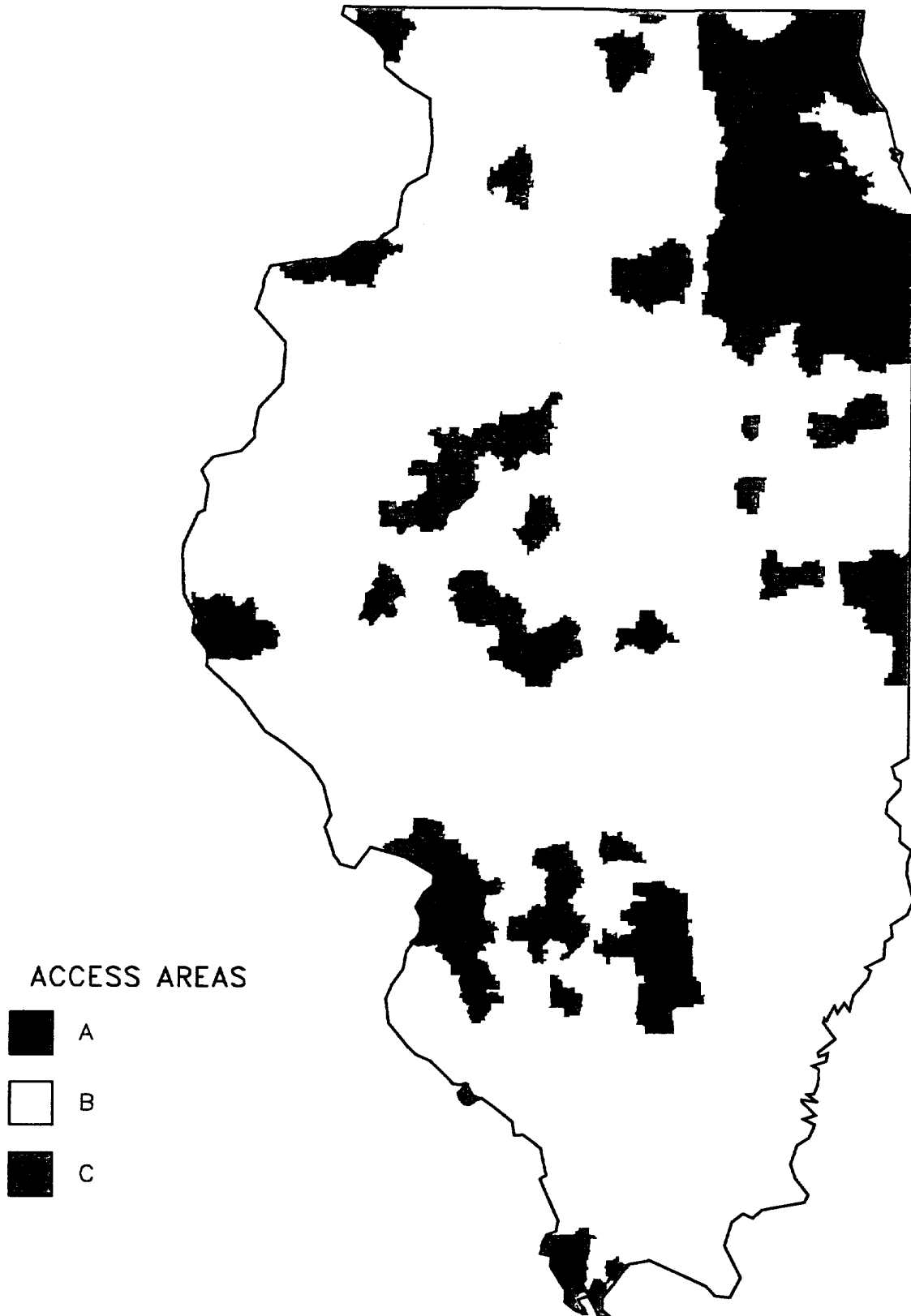
¹ Measured Rate – Additional charges for usage apply.

² Flat Rate – Does not include Access Area L

³ Prices are for Call Plan 400 Service; Prices for B and C are average

AMERITECH ILLINOIS

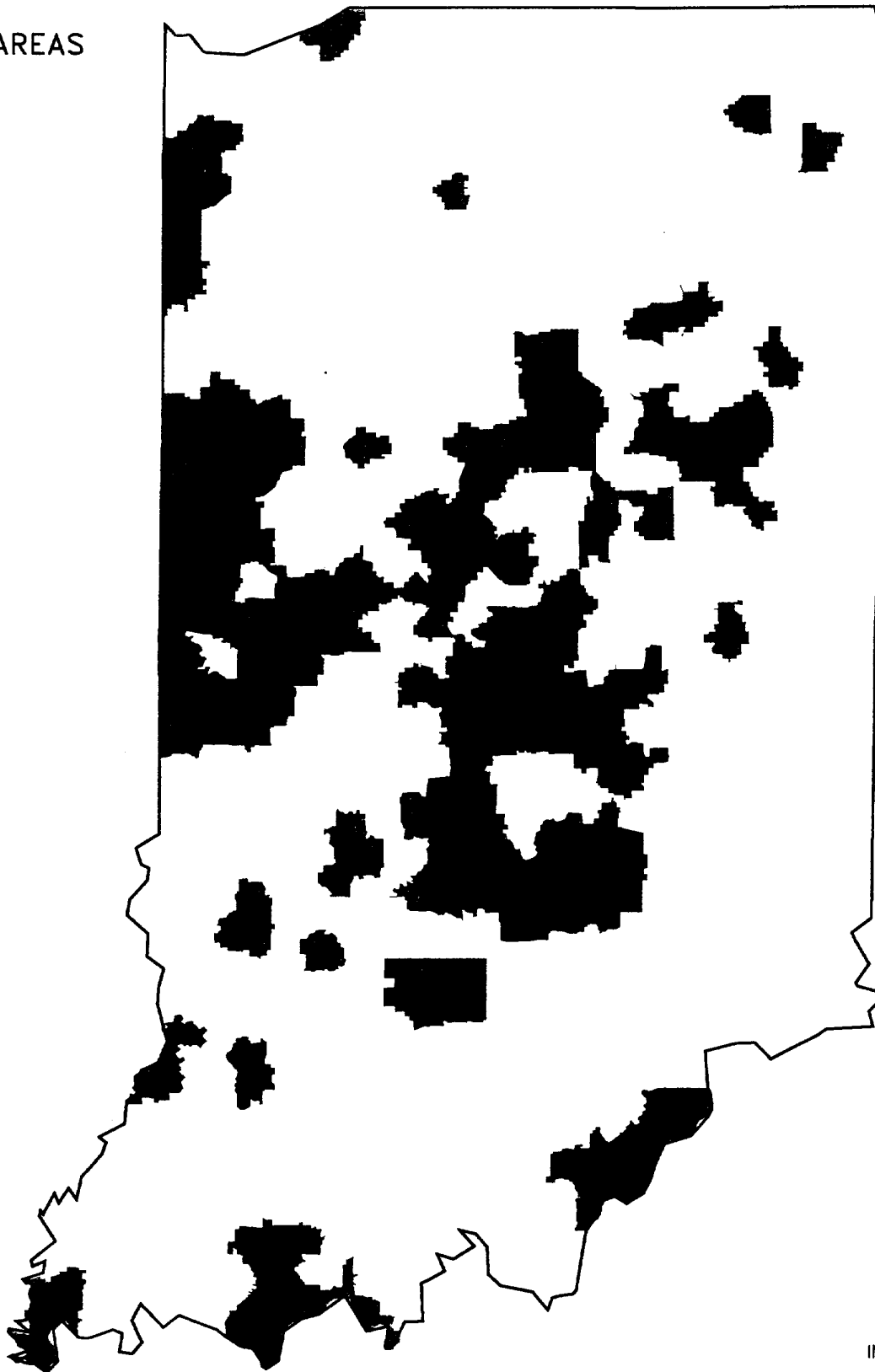
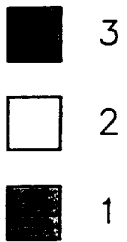
ACCESS AREAS



AMERITECH INDIANAPOLIS

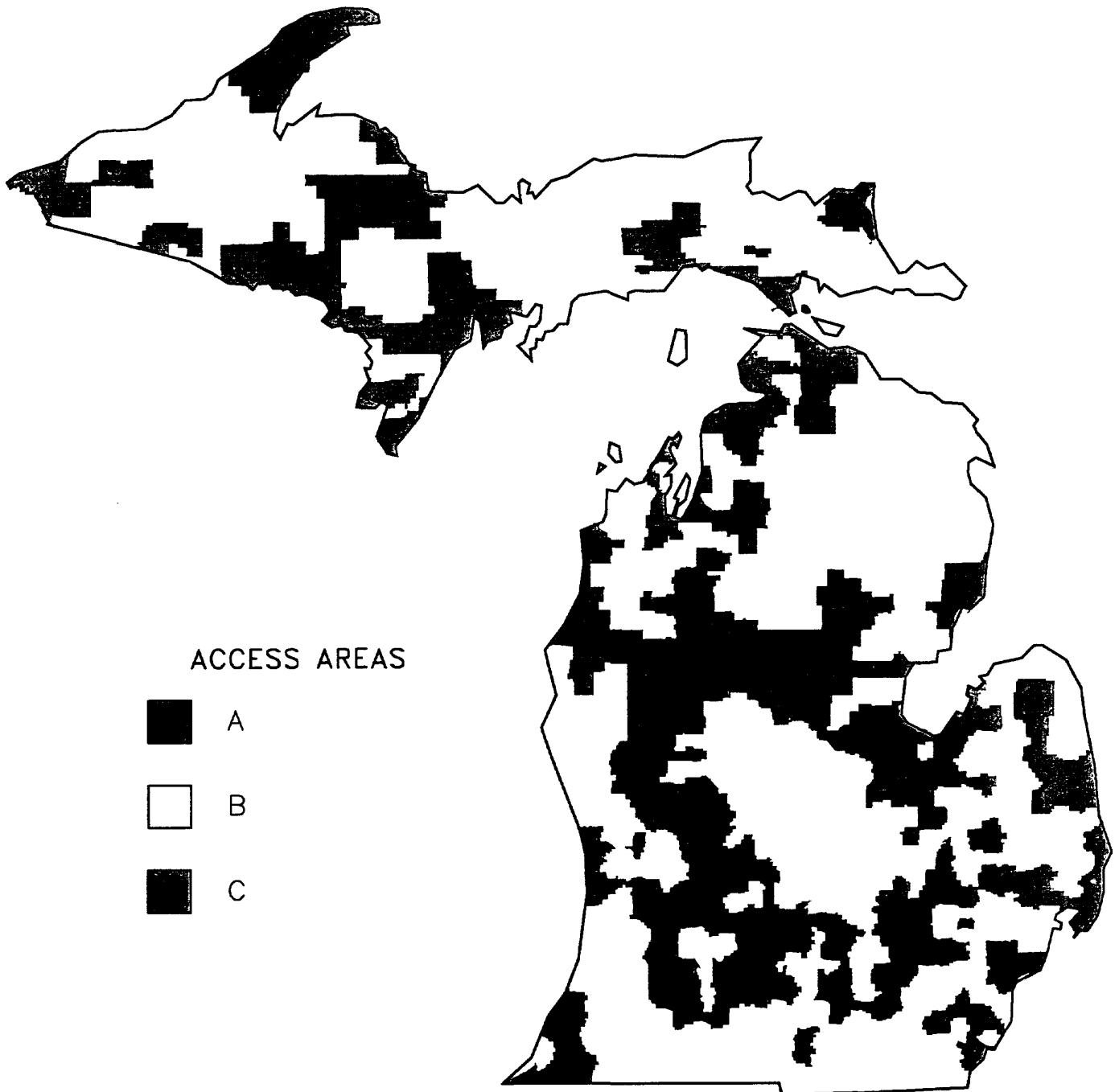
ACCESS AREAS

ACCESS AREAS

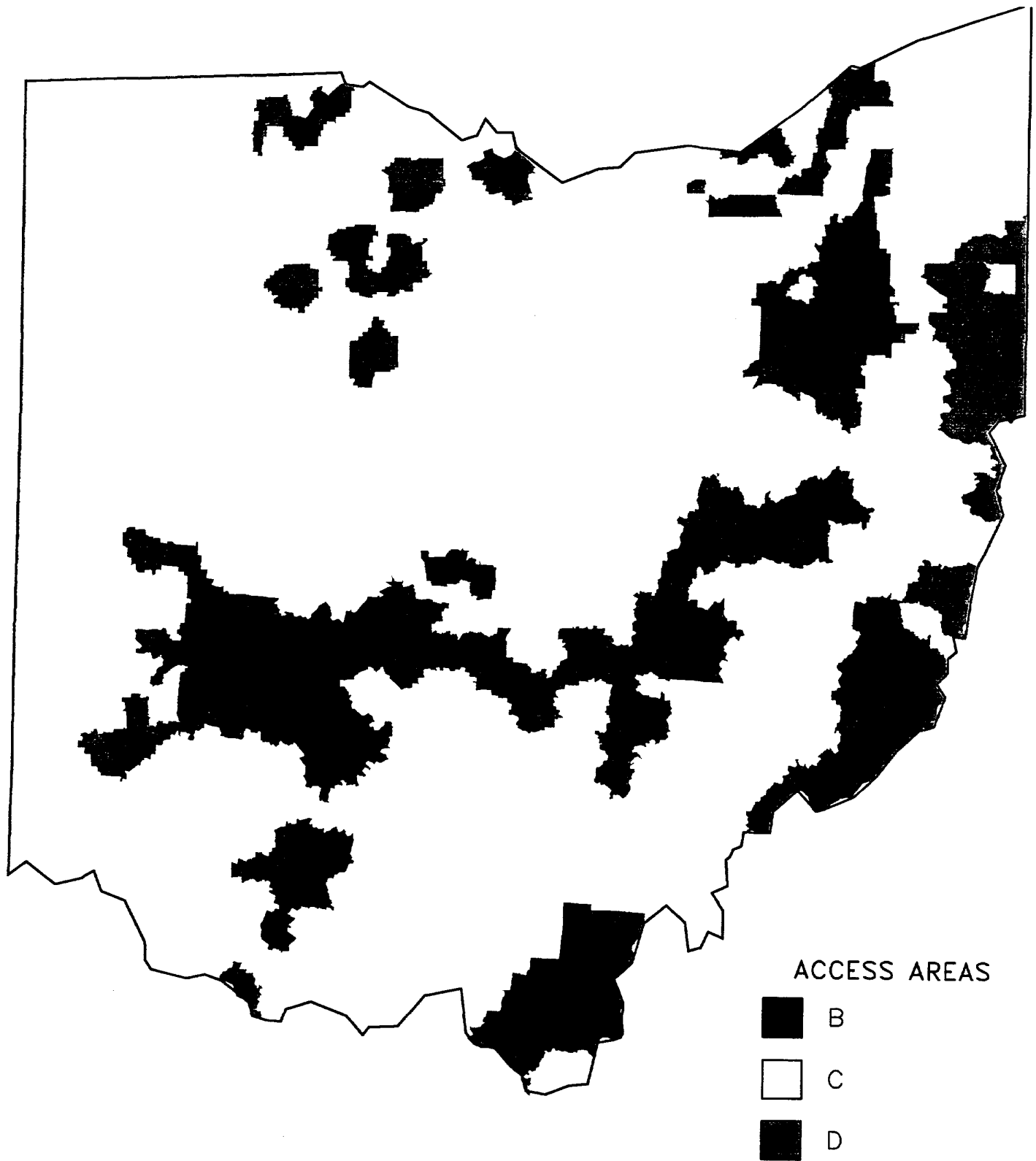


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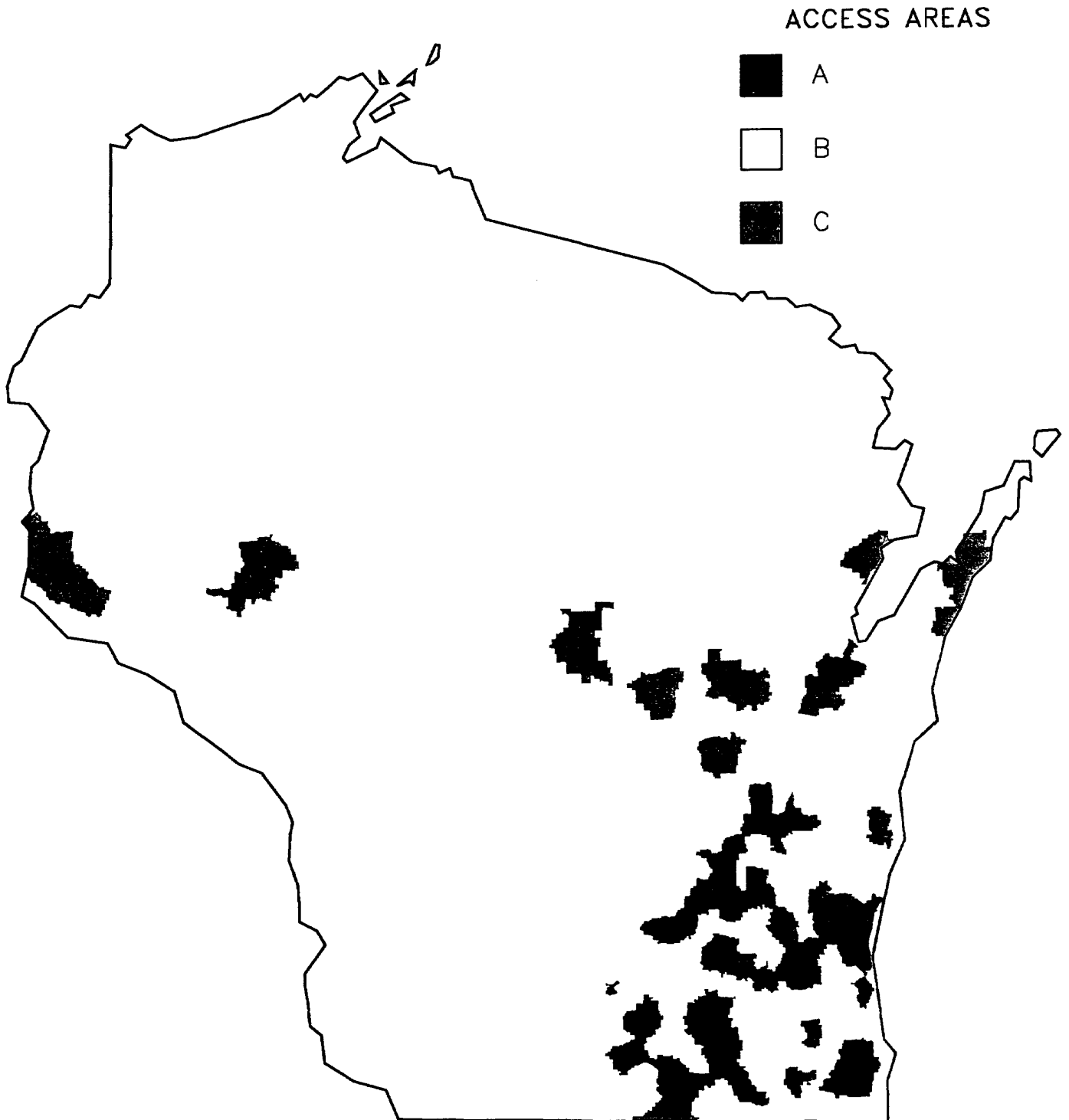
AMERITECH MICHIGAN ACCESS AREAS



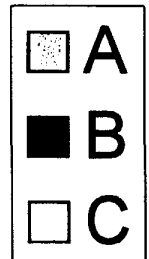
AMERITECH OHIO ACCESS AREAS



AMERITECH WISCONSIN ACCESS AREAS

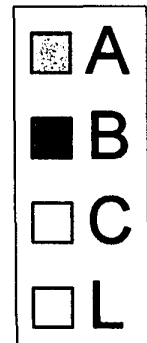
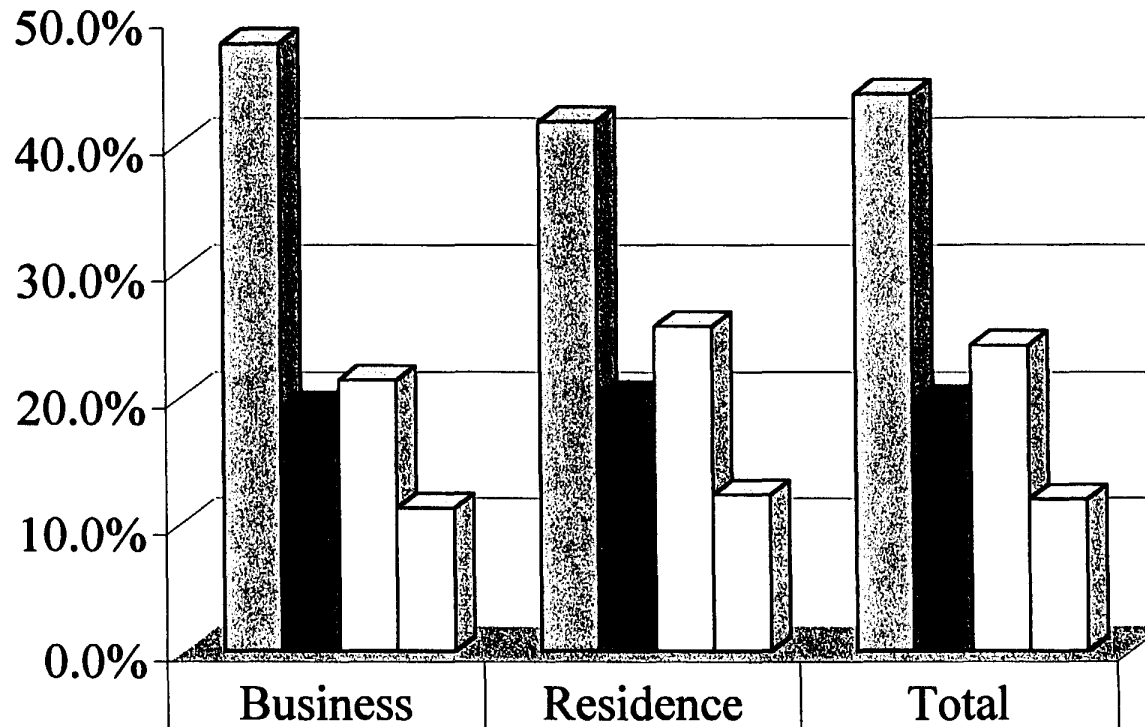


Ameritech - Illinois: % of Lines by Access Area



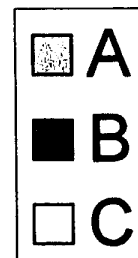
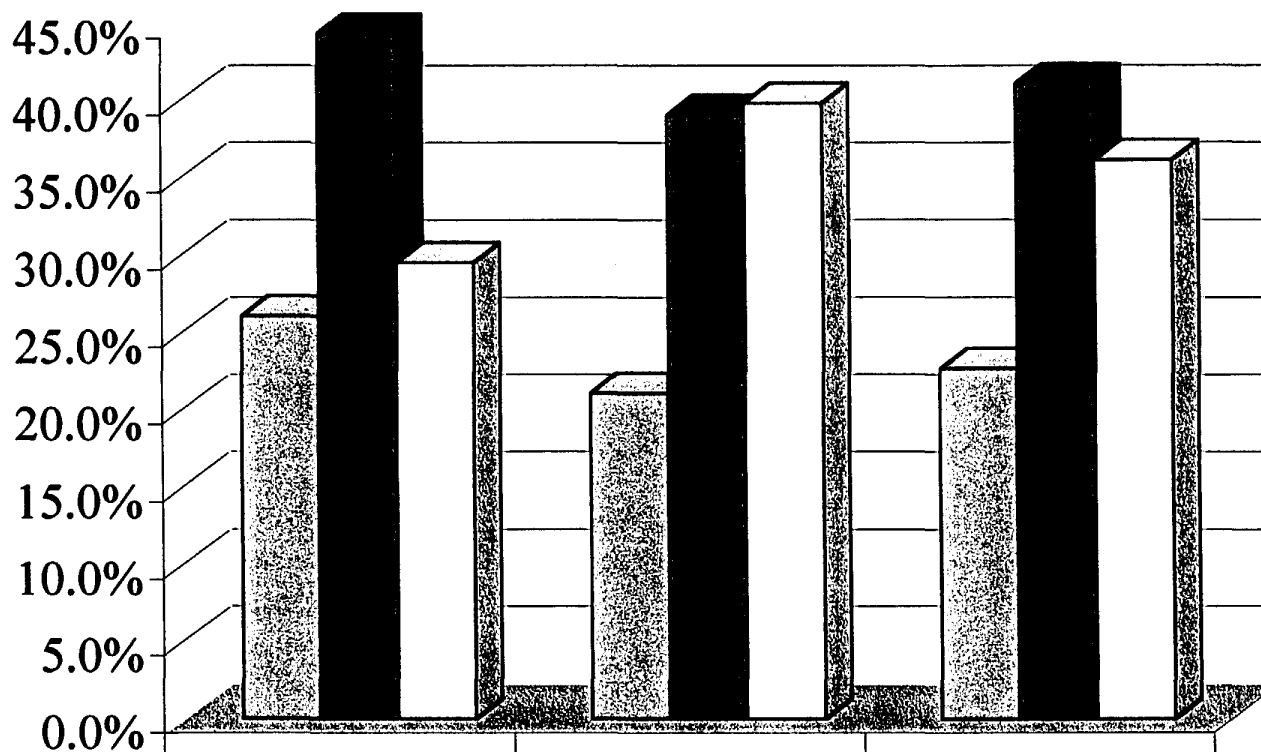
| | Business | Residence | Total |
|---|----------|-----------|-------|
| A | 15.3% | 1.9% | 7.3% |
| B | 27.6% | 34.7% | 31.9% |
| C | 57.1% | 63.4% | 60.8% |

Ameritech - Indiana: % of Lines by Access Area



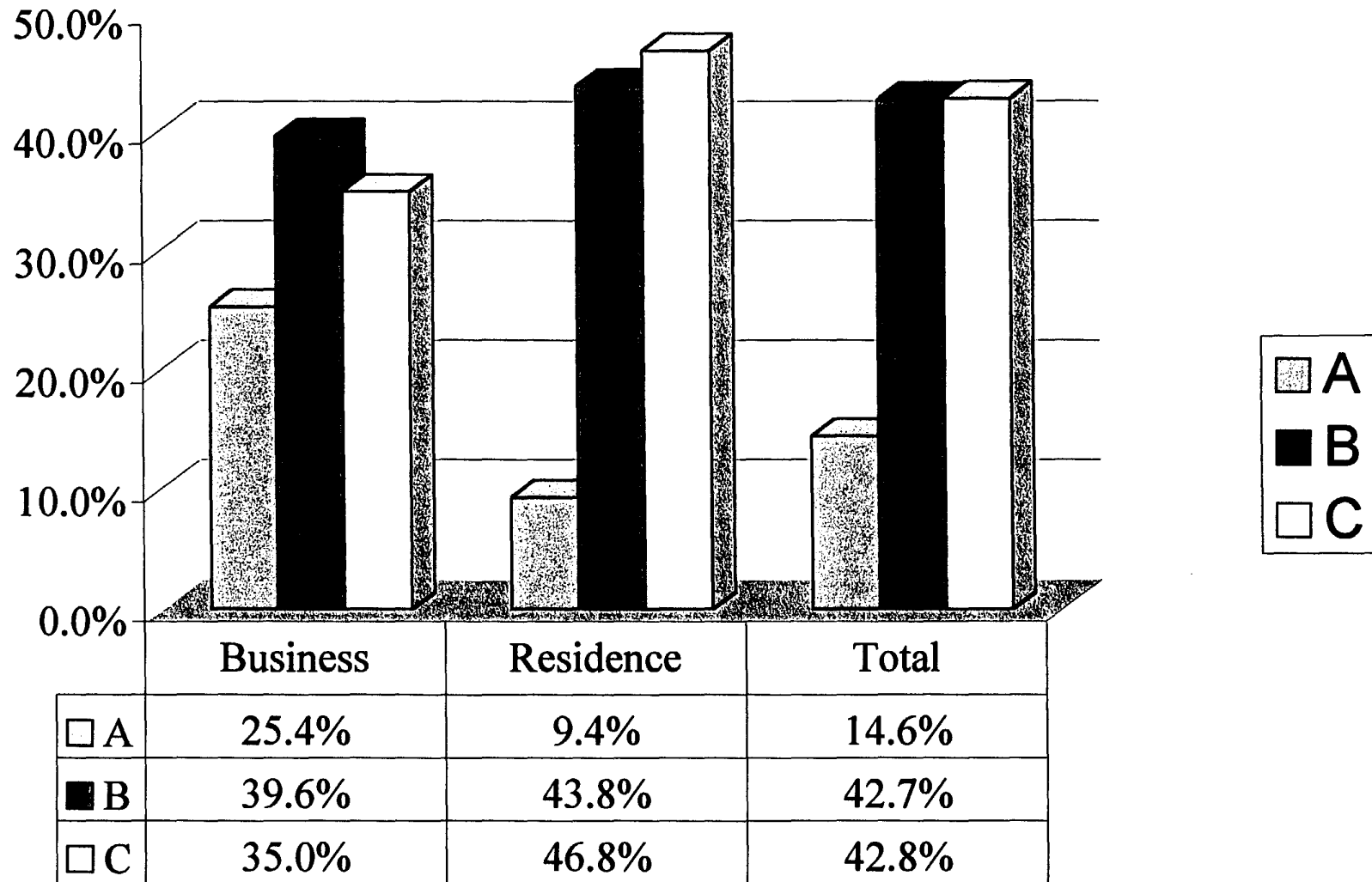
| | Business | Residence | Total |
|-----|----------|-----------|-------|
| ■ A | 48.0% | 41.8% | 44.0% |
| ■ B | 19.3% | 20.1% | 19.8% |
| □ C | 21.4% | 25.7% | 24.2% |
| □ L | 11.3% | 12.4% | 12.0% |

Ameritech - Michigan: % of Lines by Access Area

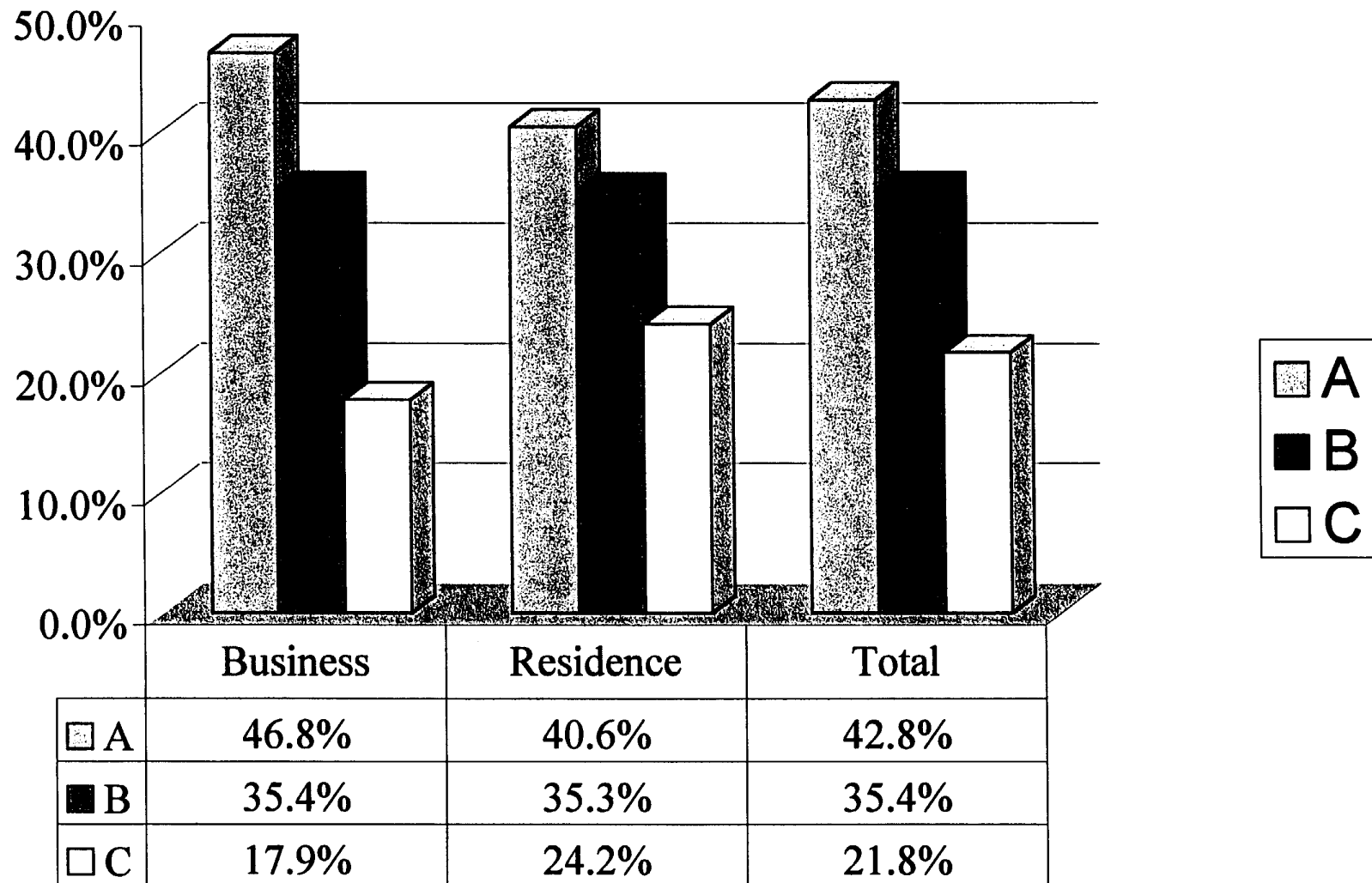


| | Business | Residence | Total |
|-----|----------|-----------|-------|
| □ A | 26.1% | 21.1% | 22.7% |
| ■ B | 44.4% | 39.1% | 41.1% |
| □ C | 29.6% | 39.9% | 36.2% |

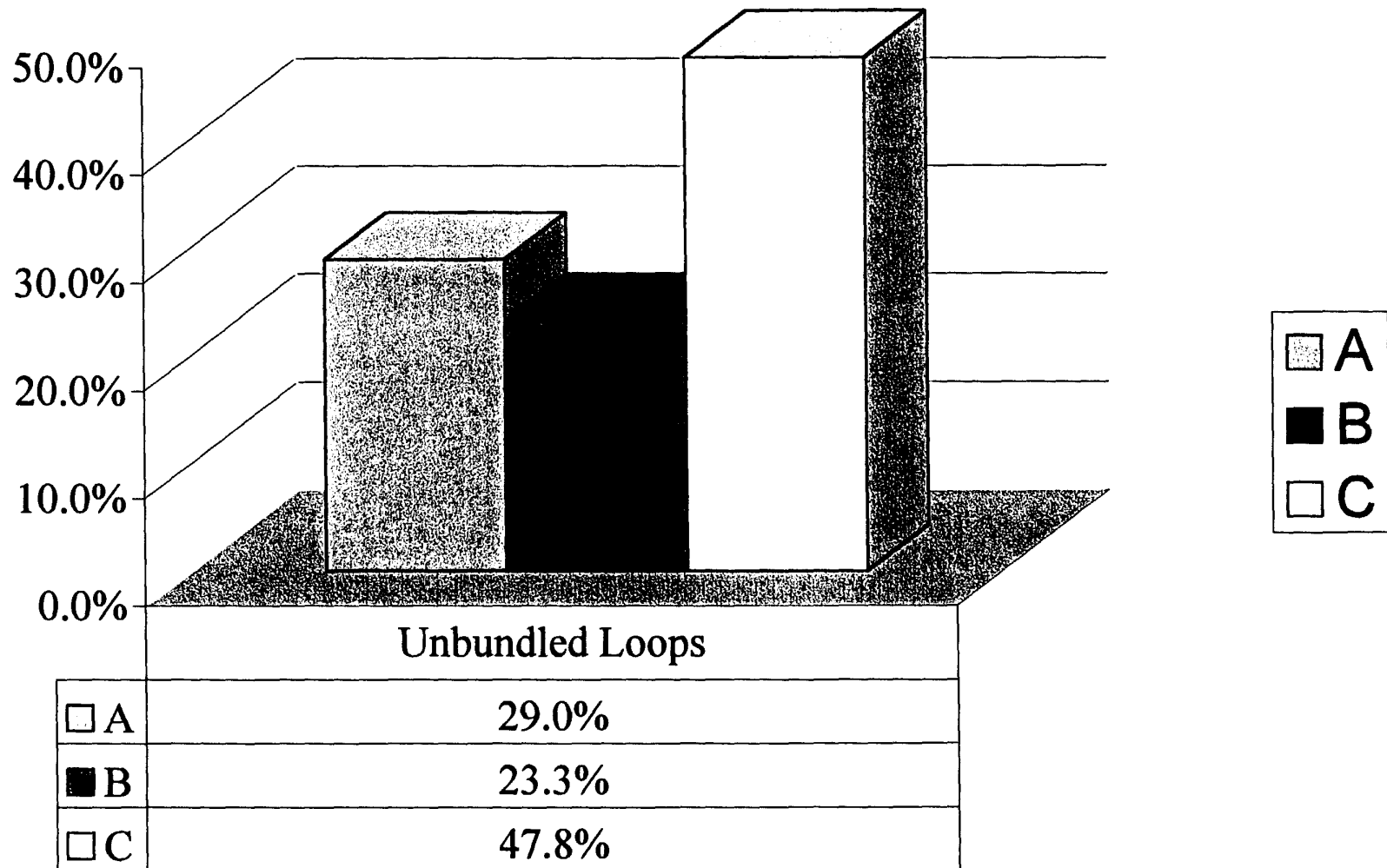
Ameritech - Ohio: % of Lines by Access Area



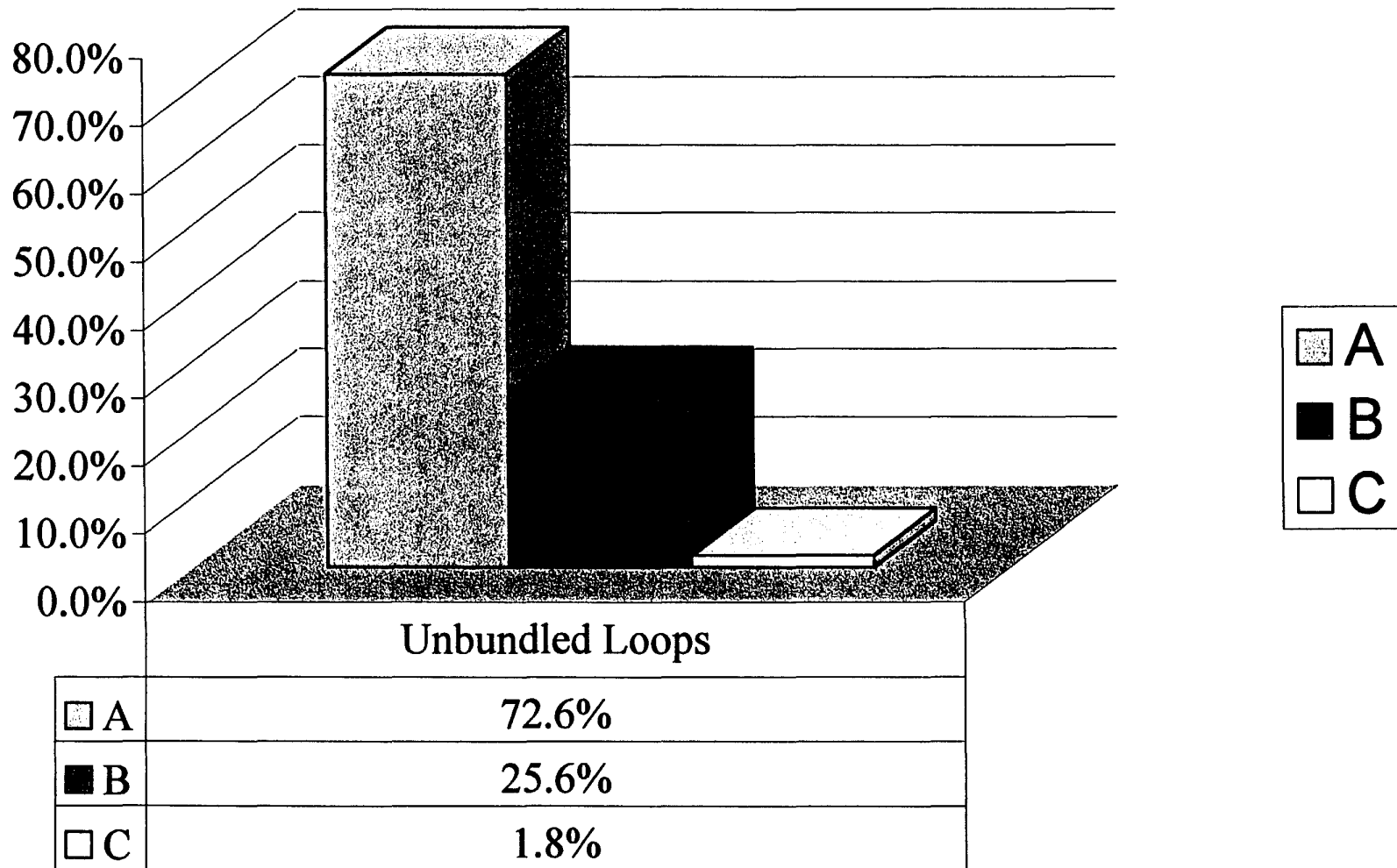
Ameritech - Wisconsin: % of Lines by Access Area



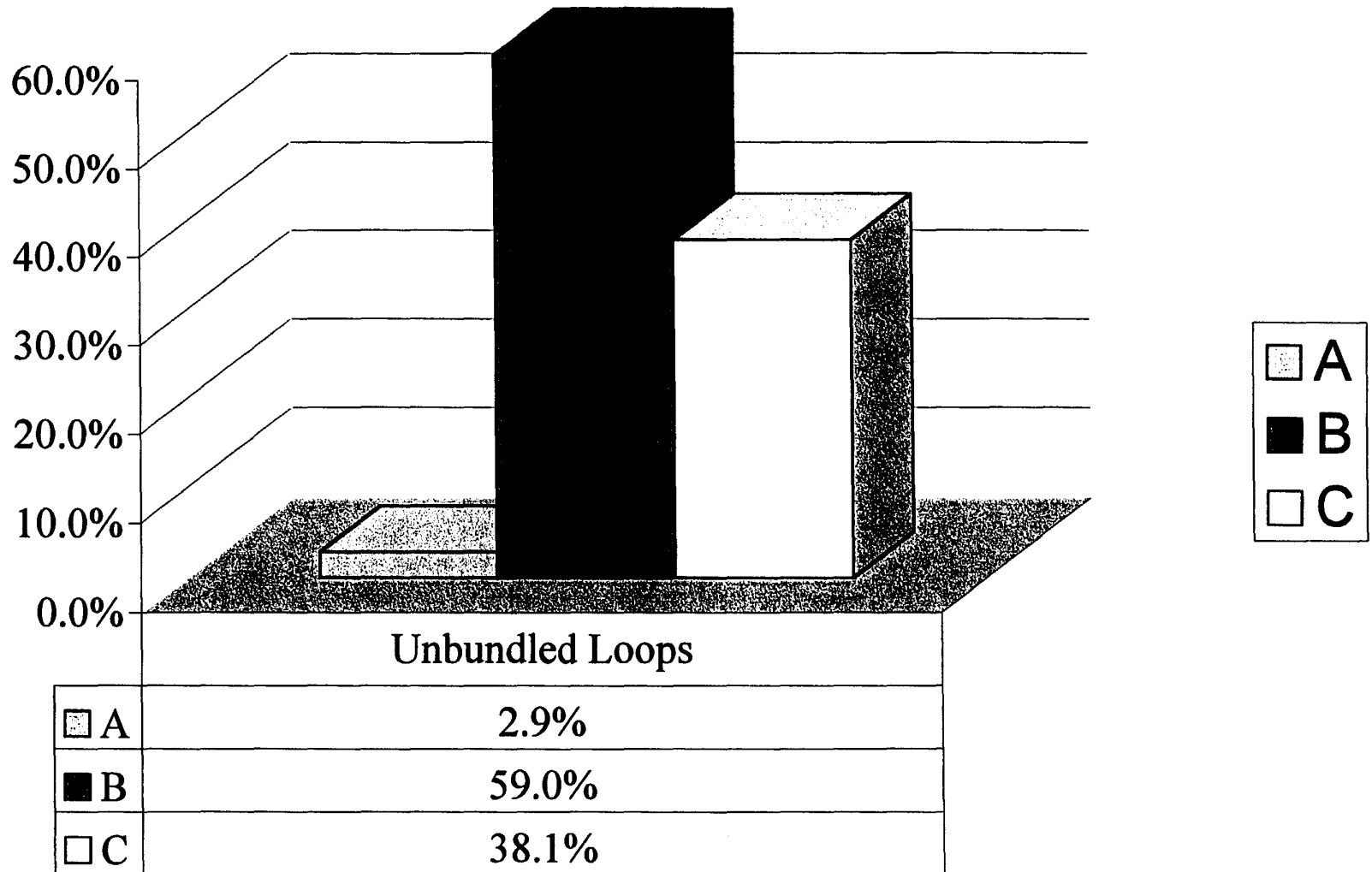
Ameritech - Illinois: % of Unbundled Loops by Access Area



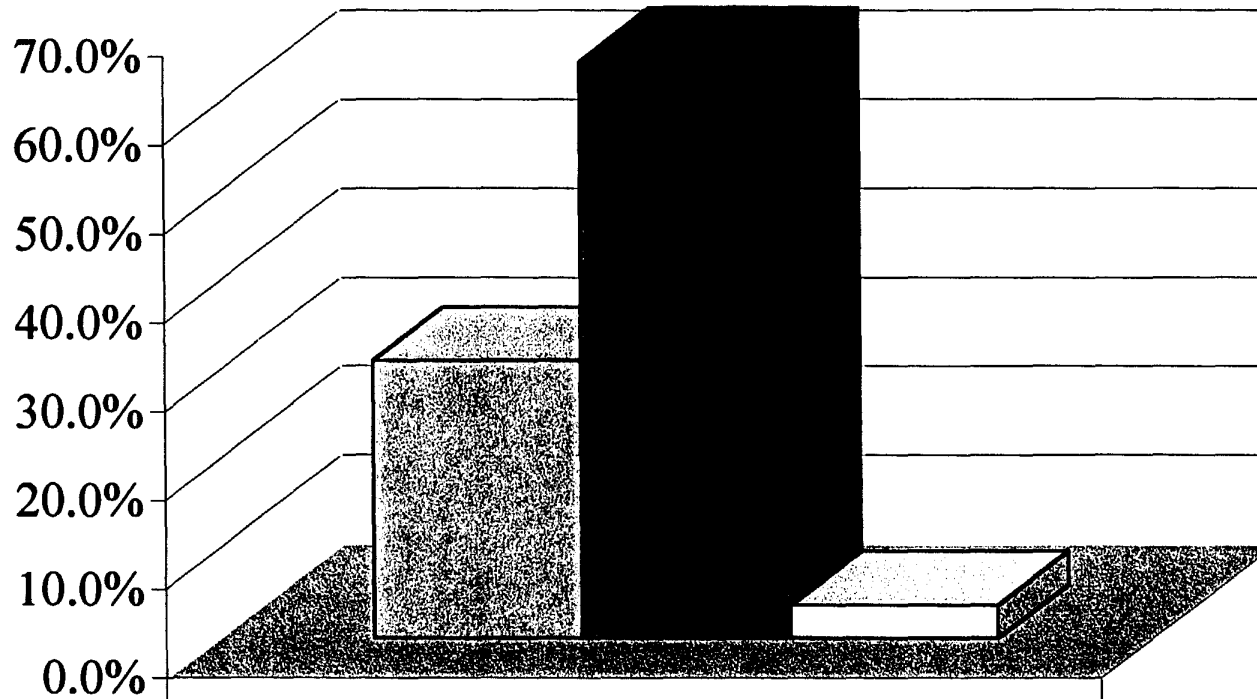
Ameritech - Indiana: % of Unbundled Loops by Access Area



Ameritech - Michigan: % of Unbundled Loops by Access Area

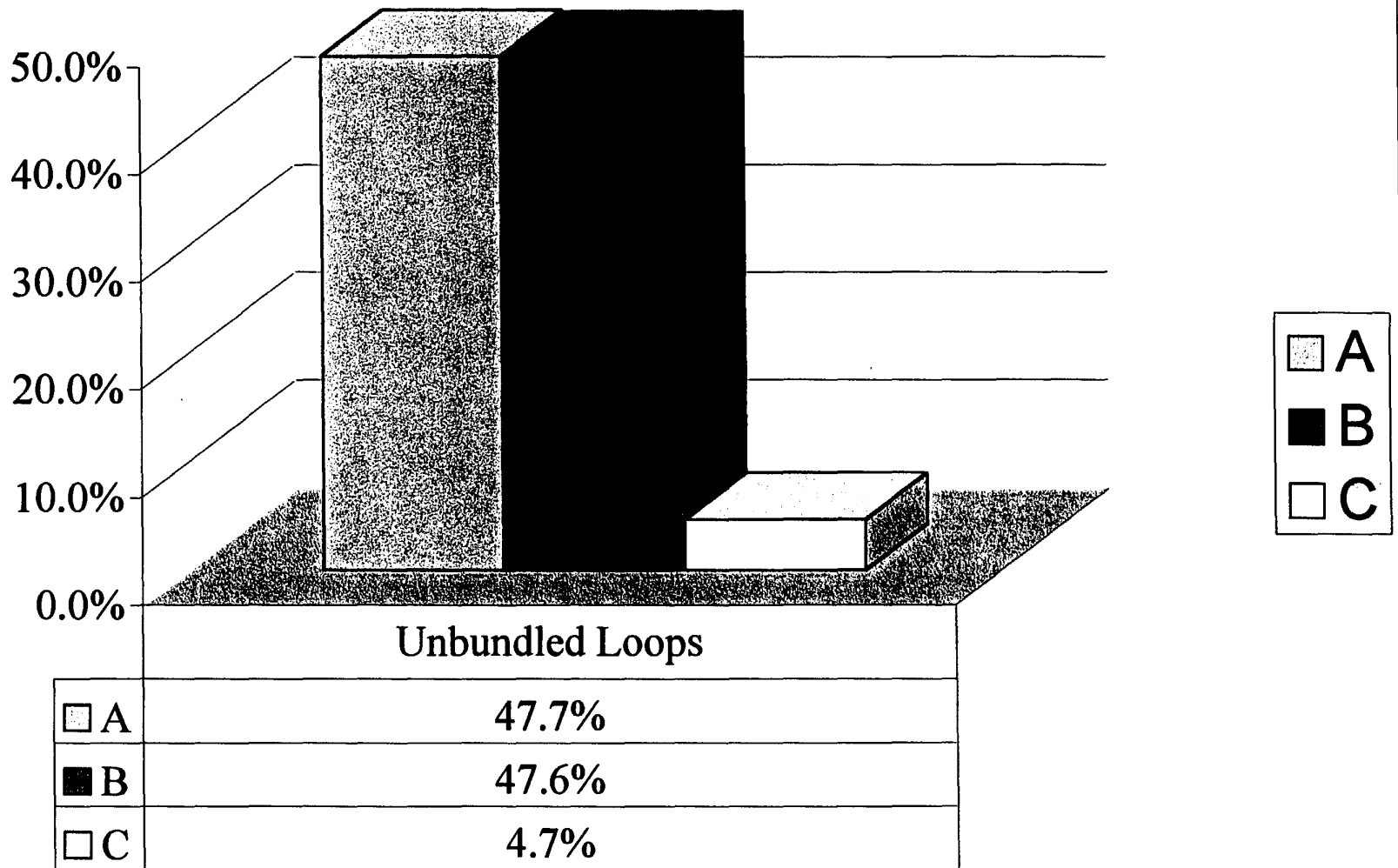


Ameritech - Ohio: % of Unbundled Loops by Access Area



| | |
|---------------------------------------|-------|
| <input type="checkbox"/> A | 31.3% |
| <input checked="" type="checkbox"/> B | 64.9% |
| <input type="checkbox"/> C | 3.8% |

Ameritech - Wisconsin: % of Unbundled Loops by Access Area



Access Lines by Access Area - May, 1999

| <u>Illinois</u> | <u>Business</u> | <u>Residence</u> | Unbundled <u>Loops</u> | <u>Coin</u> | <u>Total</u> |
|-----------------|-----------------|------------------|---------------------------|-------------|--------------|
| A | 417,563 | 79,193 | 9,806 | 6,073 | 512,635 |
| B | 751,214 | 1,451,669 | 7,872 | 27,087 | 2,237,842 |
| C | 1,555,610 | 2,656,206 | 16,161 | 38,681 | 4,266,658 |
| Total | 2,724,387 | 4,187,068 | 33,839 | 71,841 | 7,017,135 |

| <u>Indiana</u> | <u>Business</u> | <u>Residence</u> | Unbundled <u>Loops</u> | <u>Coin</u> | <u>Total</u> |
|----------------|-----------------|------------------|---------------------------|-------------|--------------|
| A | 367,091 | 604,133 | 3,009 | 10,375 | 984,608 |
| B | 147,579 | 290,660 | 1,059 | 4,641 | 443,939 |
| C | 164,004 | 370,998 | 74 | 6,365 | 541,441 |
| L | 86,760 | 179,068 | 0 | 3,458 | 269,286 |
| Total | 765,434 | 1,444,859 | 4,142 | 24,839 | 2,239,274 |

| <u>Michigan</u> | <u>Business</u> | <u>Residence</u> | Unbundled <u>Loops</u> | <u>Coin</u> | <u>Total</u> |
|-----------------|-----------------|------------------|---------------------------|-------------|--------------|
| A | 491,301 | 730,640 | 1,561 | 16,295 | 1,239,797 |
| B | 835,705 | 1,353,327 | 31,628 | 24,928 | 2,245,588 |
| C | 556,722 | 1,380,668 | 20,458 | 19,378 | 1,977,226 |
| Total | 1,883,728 | 3,464,635 | 53,647 | 60,601 | 5,462,611 |

| <u>Ohio</u> | <u>Business</u> | <u>Residence</u> | Unbundled <u>Loops</u> | <u>Coin</u> | <u>Total</u> |
|-------------|-----------------|------------------|---------------------------|-------------|--------------|
| A | 319,546 | 258,614 | 10,583 | 8,685 | 597,428 |
| B | 499,348 | 1,211,387 | 21,925 | 18,076 | 1,750,736 |
| C | 441,384 | 1,294,425 | 1,279 | 18,396 | 1,755,484 |
| Total | 1,260,278 | 2,764,426 | 33,787 | 45,157 | 4,103,648 |

| <u>Wisconsin</u> | <u>Business</u> | <u>Residence</u> | Unbundled <u>Loops</u> | <u>Coin</u> | <u>Total</u> |
|------------------|-----------------|------------------|---------------------------|-------------|--------------|
| A | 344,354 | 569,520 | 7,971 | 11,077 | 932,922 |
| B | 260,478 | 495,234 | 7,946 | 7,260 | 770,918 |
| C | 131,616 | 339,272 | 784 | 3,964 | 475,636 |
| Total | 736,448 | 1,404,026 | 16,701 | 22,301 | 2,179,476 |

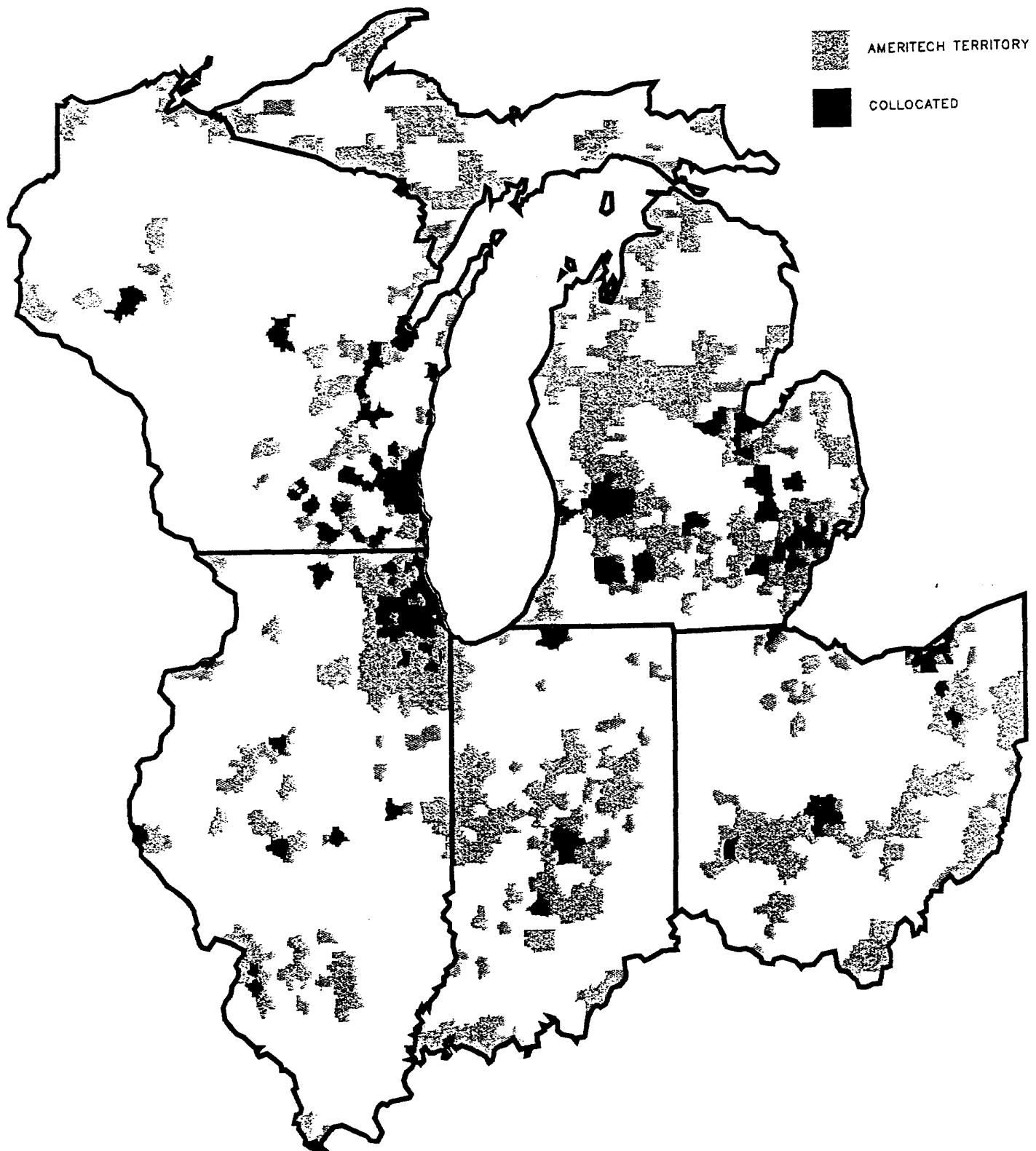
Access Area A = "Low Cost" Area

Access Area B = "Medium Cost" Area

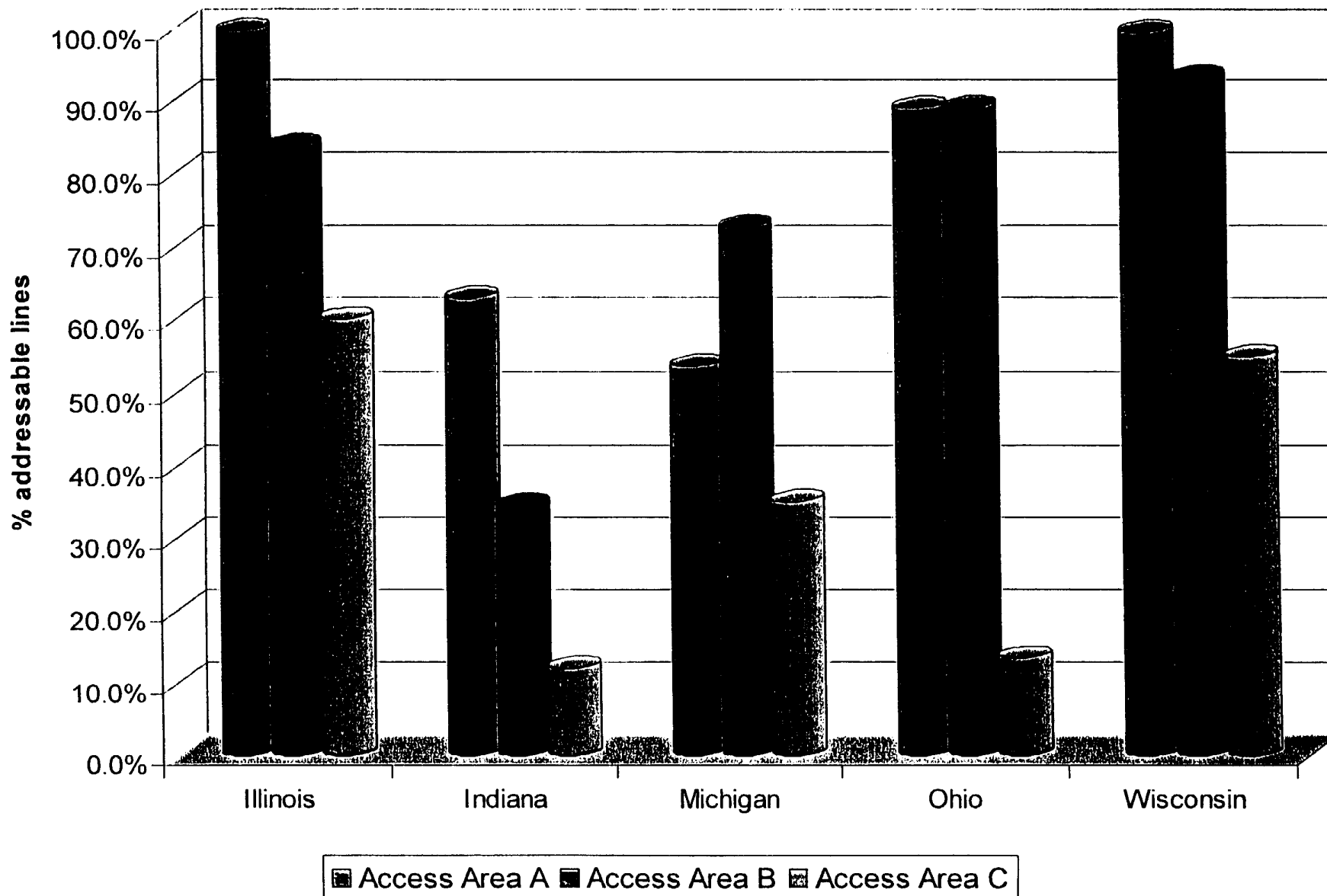
Access Area C = "High Cost" Area

AMERITECH REGION

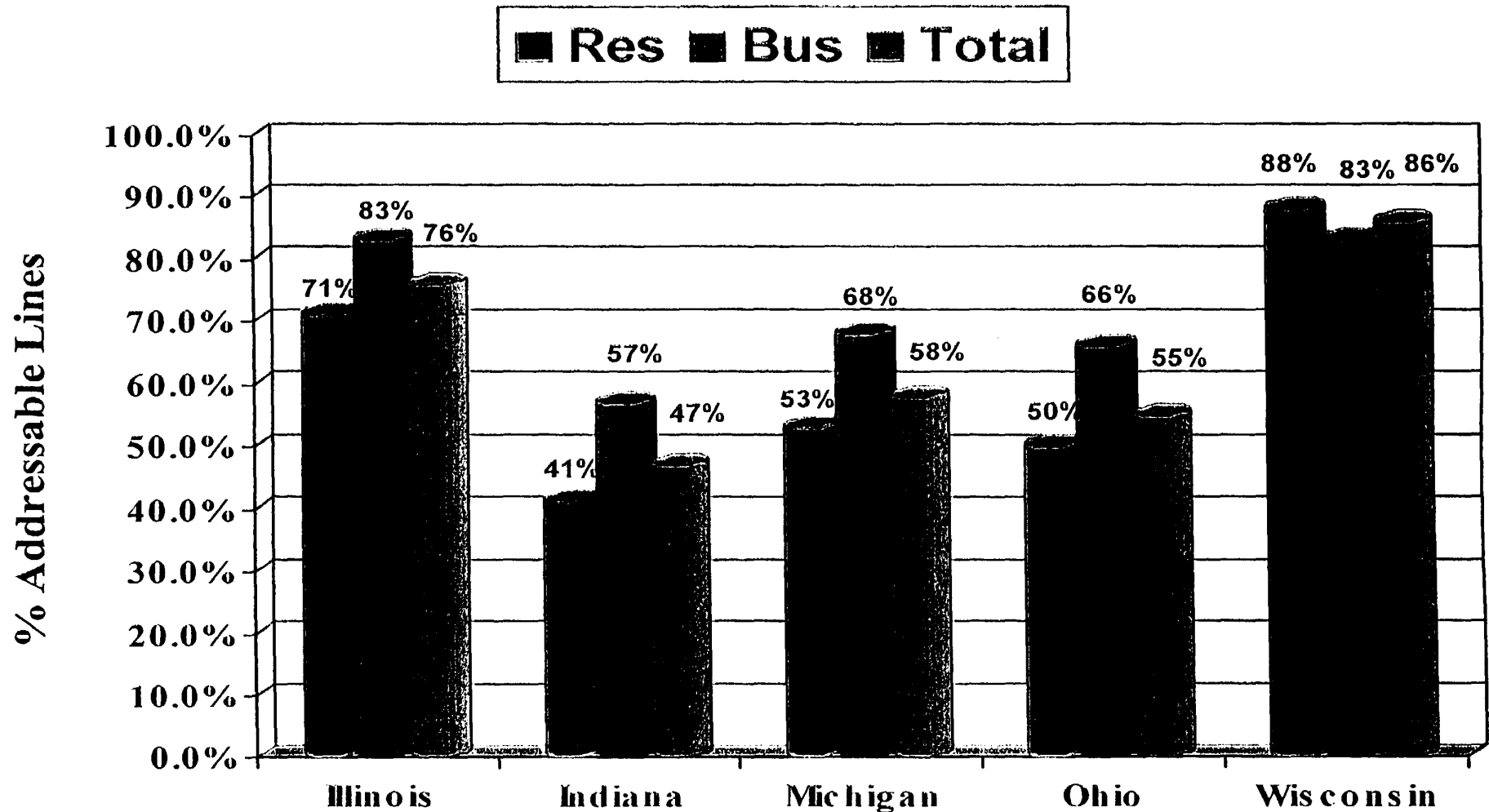
COLLOCATED WIRE CENTERS



% of Addressable Lines Through Collocation by Access Area

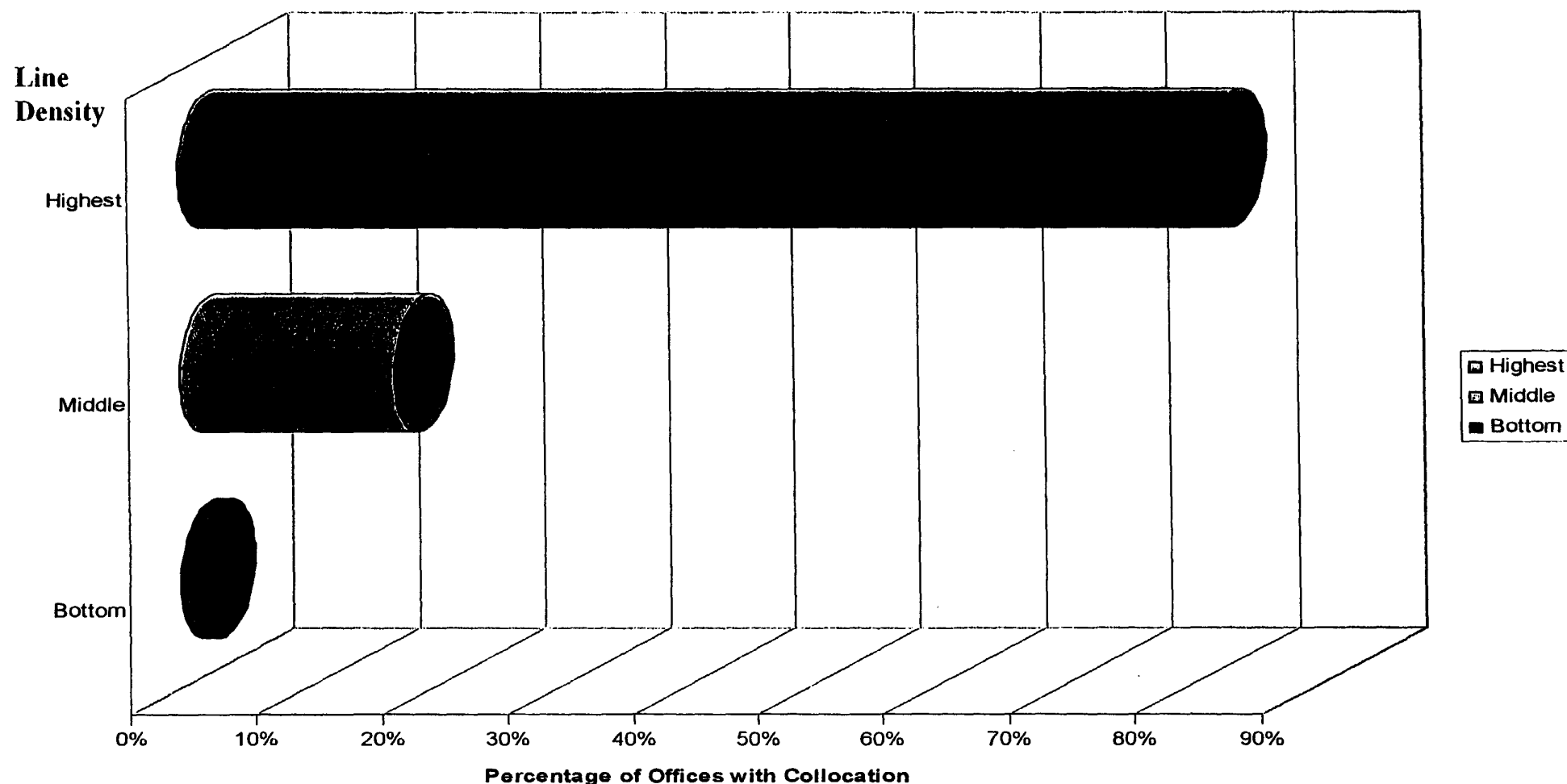


% Collocation Addressable Lines By State



• There are 850 existing collocation sites in the Ameritech region.

Percentage of Central Offices with Collocation by Line Density Area



- *Competitors have collocated in the offices where there is the greatest line density, targeting more than 75% of those offices . By contrast, CLECs have virtually no collocation in offices with lower line density.*

CLECs are clearly targeting high density areas and ignoring the rest.